

FILED  
UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS  
2003 DEC 18 P 1:02

\*\*\*\*\*  
FRANK SACO  
Plaintiff  
  
v.  
  
TUCANA TUG and  
TUCANA TUG CORPORATION  
Defendants  
\*\*\*\*\*

U.S. DISTRICT COURT  
DISTRICT OF MASS.  
C.A. NO.:  
  
COMPLAINT  
  
**03 12551 NG**


SEAMAN'S AFFIDAVIT

I, DAVID B. KAPLAN, Attorney for the plaintiff in the above-entitled action, on oath depose and state as follows:

The plaintiff in the above-entitled action is a seaman and claims the benefits of the United States Code Annotated, Title 28, Section 1916, which states that:

In all courts of the United States,  
seaman may institute and prosecute  
suits and appeals in their own names  
and for their own benefit for wages  
or salvage or the enforcement of laws  
enacted for their health or safety  
without prepaying fees or costs or  
furnishing security therefor.

Respectfully submitted,

  
DAVID B. KAPLAN, #258540  
The Kaplan/Bond Group  
Boston Fish Pier  
West Building - Suite 304  
Boston, MA 02210  
(617) 261-0081